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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

CIVIL L.R. 7-11 and 79-5(f)

Judge: Hon. Vince Chhabria
Special Master Daniel Garrie
Courtroom: 4, 17th Floor

Pursuant to Civil Local Rules 7-11 and 79-5(f) and the Stipulated Protective Order entered by the Court on August 17, 2018 (Dkt. No. 122), Plaintiffs hereby submit this Administrative Motion to Consider Whether Another Party's Materials Should Be Sealed.

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing
1	Full 30(b)(6) Deposition Transcript of Konstantinos Papamiltiadis (February 23, 2021) [Exhibit 31 to the Joint Declaration of Derek W. Loeser and Lesley E. Weaver in Support of Plaintiffs' Motion for Sanctions]	Confidential Information: 6: 14-16, 20-23 46: 10-12 48: 4-11, 15-17, 20-25 49: 1-10, 17-19 50: 10-13, 19-24 51: 9-16 53: 1-25 54: 1-3 56: 14-25 57: 1-12 58: 8-25 59: 1-25 60: 1-25 61: 1-21 62: 3-25 63: 1-20 64: 12-25 65: 1-25 66: 1-5, 19-23, 25 67: 1-11, 15-25 68: 1-25 69: 1-25 70: 1-12, 20-25 71: 1-8, 13-25 72: 1-9, 20-25 73: 1-13, 17-20 74: 25 75: 1-25 76: 1-10 77: 18-25 78: 1-20 79: 17-25 80: 1-2, 11-25 81: 1-19 82: 14-24 83: 3-25 84: 1-25 85: 1-25	Defendant to provide evidence, per Local Rule 79-5(f)

	86: 1-25 87: 1-16 88: 13-21, 24-25 89: 1-25 90: 1-25 91: 1-25 92: 1-25 93: 15-25 94: 1-8, 18-25 95: 1-25 96: 1-25 97: 1-25 98: 1-8, 21-22 100: 4-21 101: 7-25 102: 1-8, 16-24 104: 11-25 105: 1-25 106: 1-25 107: 1-25 108: 1-12 110: 2-5 111: 12-17 113: 13-23 114: 24-25 115: 1 116: 17-25 123: 9-20 124: 6-17 125: 17-25 129: 10-25 130: 1-25 131: 1-25 132: 1-25 133: 1-25 134: 1-25 135: 1-12, 25 136: 1-12 143: 4-6, 18-25 144: 1-25 145: 1-2 146: 11-16 148: 10-16 149: 4-6, 10-12 152: 4-25 153: 1-25 154: 1-25	
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	155: 1-18 159: 15-25 160: 1, 14-20, 23-25 161: 1-9, 13-25 162: 3-22 163: 3-7 164: 9-25 165: 1-17, 22-25 166: 1-14, 20-22, 24-25 167: 3-15, 23-25 168: 1, 13-19 169: 12-23 179: 21-23, 25 180: 1-4, 6-16, 19-20, 22-25 181: 2, 10-16, 18-25 182: 1-2, 8-13, 15-17, 19-21, 23-25 183: 1-17 188: 14-20 197: 12-16 198: 17-25 199: 1-8 201: 6-14 210: 11-25 211: 1-25 212: 1-6 217: 14-19, 21-24 218: 2-5, 8-12, 16-25 219: 1-25 220: 1-13 221: 7-25 222: 1-9 223: 3-17, 21-25 224: 1-25 225: 2-25 226: 1-15 229: 1-25 230: 1-25 231: 1-25 232: 1-25 233: 1-25 234: 1-14 237: 3-25 238: 1-6 239: 3-25 240: 1-3 245: 1-25	
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		246: 1-25 247: 1-25 248: 1-25 249: 1-23 259: 1-25 260: 1-4, 6-22 263: 7-25 264: 1-21 265: 21-23 267: 3-13 268: 2-25 269: 1-25 270: 1-3, 19-25 271: 1-25 272: 1-25 273: 1-9 277: 20-25 Pages 1-50 of the Word Index Highly Confidential: 6: 17-19 240: 4-25 241: 1-25 242: 1-19 243: 3-25 244: 1-25	
2	Full 30(b)(6) Deposition Transcript of Michael Duffey (June 2, 2022) [Exhibit 95 to the Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental Sanctions Brief]	38:14-19 39:12-40:25 41:6-7 41:14-42:19, 42:22 43:19-22, 43:25 44:1-21 46:7-47:18, 47:25 48:1-9, 48:13-15 49:1-25 50:10-52:2 52:22-55:16 56:9-58:2 58:11-63:17 64:17-65:4 65:16-66:4 66:14-15, 66:20-67:4 69:11-25 70:11-14 72:21-73:5 73:18-21	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information; Defendant to provide evidence, per Local Rule 79-5(f)

		75:10-20 77:17-21 79:1-17 82:23-83:6 83:12-84:9 85:15-22 86:15-18 93:21-94:3 96:21-97:3 97:8-10 126:5-11 154:3-24 156:6-22 158:1-19 161:1-11 163:24-164:6 165:15-20 168:18-169:2 173:1-5 178:20-23 184:5-9 Errata: Page/Line Corrections at 39:16, 69:15-21, 79:1-4	
3	Full 30(b)(6) Deposition Transcript of Isabella Leone (August 5, 2022) ¹ [Exhibit 98 to the Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental Sanctions Brief]	Entire document	Defendant to provide evidence, per Local Rule 79-5(f)
4	Full 30(b)(6) Deposition Transcript of Michael Clark (May 18, 2022) [Exhibit 103 to the Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental Sanctions Brief]	19:3-5, 19:7-8, 19:14-15 25:21-24 34:12-15, 34:19-20, 34:25-35:3, 35:15, 35:17 36:1-3, 36:8-18, 36:21-22 37:2-10, 37:17-21 40:13-14, 40:16-21 41:4-14 48:2-6, 48:17-19 52:18, 52:20-22	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information; Defendant to provide evidence, per Local Rule 79-5(f)

¹ The rough version of the Leone 30(b)(6) Deposition Transcript was originally filed as Exhibit 98, Dkt. No. 988-16. Here, Plaintiffs provide the Court with the final version.

	53:4-9, 53:12-21 54:4-7, 54:14 57:1-4, 57:7-10, 57:13, 57:16, 57:18, 57:20-24 58:14-16, 58:25-59:2, 59:22- 23 60:2-8, 60:15-19 61:2-7 62:1-5, 62:9-19 65:24-25 67:8-16, 67:19-22, 67:25- 68:10, 68:17-25 69:5-8, 69:13-17, 69:24-70:1, 70:3-7, 70:13-14, 70:16-20, 70:23-25 71:2-4, 71:10-16, 71:21-22 72:15-23 73:2-10 74:6, 74:14-15, 74:18-23, 74:25 75:10-11, 75:24-76:7, 76:12- 13, 76:19-20, 76:22-23 78:11, 78:14-19 79:1-2, 79:4, 79:23-80:2, 80:16-17, 80:19-20 81:9-10 82:5-7 83:4-5 84:9 85:12, 85:14-22, 85:24 86:11 87:20 93:12-15, 93:20-21 95:19-20 97:3-4, 97:6, 97:10-11 98:13-14 99:2-3, 99:6-10, 99:17-18, 99:25-100:4, 100:12, 100:14- 17 101:7-14, 101:18-20 102:4, 102:8-10, 102:25 103:13, 103:18-19 105:16 108:7-10, 108:16-18, 108:24- 109:6 111:9-11, 111:22-25 112:3-8, 112:11, 112:21	
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	113:5-11, 113:19, 113:23-24 114:16, 114:19, 114:21 115:1-2, 115:6-8, 115:25- 116:2, 116:8-18 131:24 132:5-8, 132:10-11, 132:25- 133:2 134:20-21 136:24-137:3, 137:6-7, 137:17-138:15 139:12, 139:17, 139:19-140:1, 140:5-11, 140:23 141:1-142:10, 142:12-17, 142:19, 142:21-22 143:6-23 144:10, 144:12-14 158:13-14, 158:19, 158:24- 159:9, 159:22 160:19-20, 160:22 161:14-162:3 164:22-24 165:1, 165:5-11, 165:13-16, 165:23-24 166:3, 166:12-13, 166:16-18, 166:24-167:1, 167:4-5, 167:13-18, 167:20-23, 167:25- 168:1, 168:5, 168:8-14, 168:18-19, 168:22 169:2-3, 169:5-9, 169:13-17 170:17-21 171:4-5, 171:8, 171:18-21 172:3, 172:7-10 173:4-11, 173:14, 173:20-24 174:21-22 175:5-10, 175:21-176:3, 176:7-10, 176:13-177:12, 177:14-18 179:21-24 180:3-4, 180:17-19, 180:25- 181:2, 181:8-17 183:2-9, 183:22-184:5, 184:9- 20 187:11, 187:14-15, 187:20, 187:22-188:2 189:24-190:2, 190:16-17, 190:25-191:2 195:3, 195:7-8	
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5	Full 30(b)(6) Deposition Transcript of Simon Cross (May 9, 2022) [Exhibit 105 to the Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental Sanctions Brief]	Confidential Portions: 26:15-21 29:8-14 43:18-23 50:10-16 56:13 56:16 56:20 56:24 57:16-21 60:7-16 62:15-63:3 74:6-11 76:3-11 77:10-78:20 78:22-79:3 80:5-81:3 81:19-82:1 96:10-21 113:18-21	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information or Highly Confidential Information; Defendant to provide evidence, per Local Rule 79-5(f)

		126:8-12 128:9-15 128:25-129:1 129:17-130:11 130:18-20 131:2-9 132:4-9 132:16-25 136:5-7 170:9-10 170:13 170:16 170:20 174:15-21 183:9-15; Highly Confidential Portions: 93:13-18 94:9-19 95:10-25 96:24-97:1 100:5-9 116:18 117:4-6 117:10-16 117:19-118:8 118:15-18 119:9-12 120:18 177:8	
6	Full 30(b)(6) Deposition Transcript of Amy Lee (February 24, 2021) [Exhibit 116 to the Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental Sanctions Brief]	6:12–13, 16–18 10:23 11:1, 4, 6, 10–11, 14 18:18–19, 24–25 19:1 22:21–25 23:4–9, 12–19 62:5–13 79:20–25 80:1–4, 13–25 81:1–25 82:1–7, 11–17, 19–24 83:1–5, 7–16, 23–24 84:1–6, 15–24 85:6–24 86:2–25	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information; Defendant to provide evidence, per Local Rule 79-5(f)

	87:1-8, 11-19, 21-25 88:1-11, 14-20, 22-25 89: 1-18, 21-25 90:1-3, 9-13, 16-25 91:1-19, 21-25 92: 3-6, 8-13, 16-23, 25 94:1-8, 11-25 95:2-11, 13-25 96:1-8, 11-25 97:1-23 98:1-25 99:1-25 100:1-4, 6-25 101:1-25 102:1-20, 22-25 103:1-25 104:1-7, 9-14, 16-25 105:1-4, 6-25 106:1-3, 5-25 107:1-25 108:1-16, 18-24 109:3-25 110:1-15 111:1-25 112:1-25 113:1-8, 11-17 114:13-22 150:24-25 151:1-6, 8-15 156:8-16 178:15-25 179:1-25 180:1-11, 15-25 181:1-25 182:1-7, 17-25 183:1-6, 8-19, 23-25 184:1-13, 15-19, 22-25 185:1-9, 12-20, 22-25 186:2-4, 6-12, 15-20, 22-25 187:2-19, 22-25 188:1-7, 10-25 189:1-11, 14-15, 19-25 190:1-4, 7-24 191:2-5, 7-17, 20-25 192:1-14, 16-25 193:2-12, 15-25 194:1-21, 23-25	
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	195:1–25 196:1–25 197:1–9, 14–25 198:1–24 199:2–4, 6–25 200:1–10, 14–25 201:1–20, 23–25 202:1–8, 11–25 203:1–13, 17–25 204:1–25 205:2–6, 9–25 206:1–2, 4–8, 10–12, 14–24 207:2–4, 7–25 208:1–11, 12–25 209:1–3, 7–17, 21–25 210:1–14, 16–25 211:1–5, 8–19 220:18–25 223:7–14, 16–25 224:3–11 Pages 1–42 of the Word Index Errata: Page/Line Corrections at 86:18, 184:15, 191:24	
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Because the above documents contain, reference, or summarize materials designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order entered in this action, Plaintiffs file the documents provisionally under seal. Pursuant to Local Rule 79-5(f)(3), Defendant, as the Designating Party, bears the responsibility to establish that its designated materials are sealable.

Dated: August 24, 2022

Respectfully submitted,

KELLER ROHRBACK L.L.P.

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Derek W. Loeser

By: /s/ Lesley E. Weaver
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Plaintiffs' Co-Lead Counsel

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the signatories. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24th day of August, 2022 in Oakland, California.

By: /s/ Lesley E. Weaver
Lesley E. Weaver

CERTIFICATE OF SERVICE

I, Lesley E. Weaver, hereby certify that on August 24, 2022, I electronically filed the foregoing document with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which will send electronic notification to all counsel of record. I also caused a copy of the under seal filing to be delivered to counsel for Defendant Facebook, Inc. via electronic mail.

/s/ Lesley E. Weaver
Lesley E. Weaver